

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
www.flmb.uscourts.gov

In re:

Chapter 11 Cases

WRS HOLDING COMPANY, *et al.*,¹

Case No. 14-_____
(Joint Administration Pending)

Debtors.
_____/

CONSOLIDATED CHAPTER 11 CASE MANAGEMENT SUMMARY

In compliance with Local Rule 2081-1(b), WRS Holding Company (“WRS Holding”), Compass Environmental, Inc. (“Compass Environmental”) and WRS Infrastructure & Environment, Inc. (“WRS Infrastructure,” with WRS Holding and Compass Environmental, the “Debtors”), file this *Consolidated Chapter 11 Case Management Summary* and state:

The following data and the data set forth in the attached exhibits represent approximations for background information only and the information may represent the Debtors’ reasonable estimate in response to some of the ensuing questions.

1. Description of Debtors’ Business:

WRS Holding owns 100% of the equity in each of WRS Infrastructure and Compass Environmental. For over 28-years the Debtors have provided high quality environmental, remediation and civil construction services with an experienced, highly skilled technical and professional workforce. The Debtors are headquartered in Tampa, Florida, but have operations throughout the United States.

For a detailed description of the Debtors, their operations, and their assets and liabilities, the Debtors respectfully refer the Court and parties-in-interest to the *Declaration in Support of First Day Pleadings* (the “First Day Declaration”), filed on the date hereof (the “Petition Date”).

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: (i) WRS Holding Company (2129); (ii) Compass Environmental, Inc. (9637); and (iii) WRS Infrastructure & Environment, Inc. (0585). The address for all of the Debtors is 221 Hobbs Street, Suite 108, Tampa, Florida 33619.

2. Location of Debtors' operations and whether the business premises are leased or owned:

Principal Place of Business:
221 Hobbs Street, Suite 108
Tampa, Florida 33619

The Debtors also occupy premises in Tallahassee and West Palm Beach, Florida and Georgia, Tennessee, Texas and New Jersey.

All of the premises used or occupied by the Debtors are leased and not owned.

3. Reasons for Filing Chapter 11: Please see First Day Declaration.

4. List of officers and directors, if applicable, and their salaries and benefits at the time of filing and during the 1 year prior to filing:

A redacted schedule containing the information required by Local Rule 2081-1(b), is attached hereto as **Exhibit A**. An unredacted schedule will be provided to the Office of the United States Trustee and will be brought to Court for the First Day hearings for the Court's review.

5. Debtors' Annual Gross Revenues:

FYE 12/31/12 - \$96,479,067

FYE 12/31/13 - \$81,922,313

6 months ending 6/30/14 - \$31,772,000

6. Amounts owed to various creditors (as of 6/30/14):

a. Priority Creditors – Zero²

b. Secured Creditors – Approximately \$21,449,980.92

Comprised of:	Term Note	-	\$9,250,000.00
	Revolver	-	\$9,601,532.92
	Standby L/C	-	\$2,598,448.00

c. Unsecured Claims – Approximately \$17,246,000

² The Debtors are current with respect to the payment of their tax liabilities. The Debtors owe payroll to certain of its employees. I am advised that these claims are entitled to priority. As of the date hereof, the payroll for the last week has not been processed and, therefore, the amount of this liability is undetermined.

7. General Description and Approximate Value of the Debtors' Current and Fixed Assets:

As of June 30, 2014, the Debtors' principal assets consist of accounts receivables (\$10.7 million); retainage (\$2.66 million); work in process (\$9.74 million); and, equipment and other fixed assets (\$2.465 million).

8. Number of Employees and Amount of Gross Wages Owed as of the Petition Date:

The Debtors employ a total of 233 salaried and hourly employees.

9. Status of Debtors' Payroll and Sales Tax Obligations:

The Debtors are current in the payment of payroll and sales taxes.

10. Anticipated emergency relief to be requested within 14 days from the petition date:

See attached **Exhibit B** which contains a list of the various "first day" motions and applications filed contemporaneously herewith.

11. The Debtors' strategic objectives, i.e., refinancing, cram down, surrender/sale of assets of business:

Through these cases, the Debtors to seek to implement a balance sheet and operational restructuring by, *inter alia*, rejecting burdensome and unprofitable agreements; reducing operating expenses; monetizing excess equipment and other tangible assets; and attracting new equity financing or a buyer for substantially all of the Debtors' assets. The Debtors have been working to attract new capital from a buyer or strategic investor. Those efforts are ongoing.

Dated this 25th day of July, 2014.

Respectfully submitted,

WRS Holding Company, *et al.*

By:



Brian Finn

Title: Treasurer of WRS Holding Company
and Compass Environmental, Inc.
Vice President of Finance of WRS
Infrastructure & Environment, Inc.

EXHIBIT "A"
List of Directors

WRS

			Car	Health	Salary change
Officers		Salary	Allow	Benefits	Last 12 months
Richard Santello	CEO/President/Director		-	-	-
John Hallisey	Corporate Counsel		-	-	
Brian Finn	VP of Finance		-	-	-
Luke Frantz	Executive VP Oper.	Terminated Employee	-	-	-
Michael Copeland	Executive VP		-	-	
Brent Anderson	Vice President		-	-	
Andy Hooper	Program Director		-	-	

Directors

*WRS Holding Company pays a Director's fee to Klaus Voss in the amount of \$20,000.00 per month plus reimbursement of expenses.

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EXHIBIT “B”
First Day Motions and Applications

1. *Ex-Parte* Motion for Joint Administration [ECF No. 6]
2. Declaration in Support of First Day Pleadings [ECF No. 8]
3. Debtors’ Application for Approval, on an Interim and a Final Basis, of the Retention of Jordi Gusó and the Law Firm of Berger Singerman LLP as Counsel for Debtors-In-Possession *Nunc Pro Tunc* to the Petition Date [ECF No. 7];
4. Debtors’ Expedited Motion for Order (I) Authorizing the Debtors (A) to Use Cash Collateral on an Interim Basis Pursuant to 11 U.S.C. § 363, and (B) to Grant Adequate Protection in Connection Therewith Pursuant to 11 U.S.C. §§ 361, 363 and 507, and (II) Scheduling a Final Hearing Under Bankruptcy Rule 4001 [ECF No. 22];
5. Debtors’ Emergency Motion For Order Authorizing Debtors To Pay Prepetition Sales, Use, Trust Fund, Property, and Other Taxes And Similar Obligations [ECF No. 13];
6. Debtors’ *Ex Parte* Motion for Authorization to File Consolidated Chapter 11 Case Management Summary [ECF No. 12];
7. Debtors’ Expedited Motion For Order (I) Authorizing Debtors To Pay (A) Certain Prepetition Employee Obligations and (B) Prepetition Withholding Obligations, (II) Authorizing The Debtors To Maintain Employee Benefit Programs, and (III) Directing Banks To Honor Related Prepetition Transfers [ECF No. 20];
8. Debtors’ Expedited Motion For (A) Authority To (I) Maintain Bank Accounts and To Continue To Use Existing Business Forms And Checks, and (II) Continue To Use Existing Cash Management System, and (B) Waiver Of Certain Investment and Deposit Guidelines [ECF No. 15];
9. Debtors’ Emergency Omnibus Motion To Reject Executory Contracts as of the Petition Date [ECF No. 10];
10. Debtors’ Motion to Limit Notice [ECF No. 9];
11. Debtors’ Emergency Motion for Authorization to (I) Continue to Administer Insurance Policies and Related Agreements; (II) Continue Certain Related Premium Financing Agreement; and (III) Honor Certain Obligations In Respect Thereof [ECF No. 16]; and
12. Debtors’ Expedited Motion For Interim and Final Orders Determining Adequate Assurance of Payment for Future Utility Services [ECF No. 18].